

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

James A. Bartholomew and Lighthouse
Management Group, Inc., as Receiver for
Lakeland Construction Finance, LLC,

Court File No. 09-CV-01279 (MJD-AJB)

Plaintiffs,

**PLAINTIFFS' MOTION
TO COMPEL DISCOVERY**

vs.

Avalon Capital Group, Inc.,

Defendant.

Pursuant to Rule 37 of the Federal Rules of Civil Procedure, Plaintiffs James A. Bartholomew and Lighthouse Management Group, Inc., as Receiver for Lakeland Construction Finance, LLC hereby move the Court for an order compelling Defendant to produce unredacted versions of the 1,982 documents identified on its privilege log and unredacted versions of documents that Avalon redacted for reasons other than privilege . This motion is brought upon all the files, records, and proceedings in this action, and is further supported by the Memorandum and Affidavit of LL. Rhyddid Watkins filed with this motion.

Signature page to follow

Dated: February 24, 2011

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s/Michael M. Krauss

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